

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

SHARON GUTHRIE,

Plaintiff,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

No. 1:22-cv-00162

JUDGE CORKER

JURY DEMANDED

JOINT MOTION TO AMEND SCHEDULING ORDER

COME NOW the parties, by and through counsel, and move the Court to amend the Scheduling Order (doc. 19). In support of the Motion, the parties show the following:

1. This case arises from a collision between a vehicle driven by Plaintiff and a large PLS (Palletized Load System) truck owned by The United States Department of the Army and operated by Samuel Anderson, a technician employed by the Tennessee National Guard under 32 U.S.C. § 709. *See generally*, Complaint (doc. 1).
2. Plaintiff contends that she suffered significant injuries as a result of the collision, including injuries that have required surgical intervention. *Id.*
3. The parties have diligently engaged in the process of discovery since the entry of the Court's Scheduling Order, including the exchange of paper discovery and preparation for depositions. Plaintiff's treatment has continued throughout this time.
4. As the parties were preparing to conduct fact witness depositions, Plaintiff learned from her treating physician that there are complications from a knee surgery performed earlier this year. Those complications will, in the opinion of Ms. Guthrie's treating physician,

require additional surgical intervention, currently scheduled for the second week in October.

5. Given these new developments, i.e. Plaintiff's continued medical treatment, the parties contend that depositions should be postponed until *after* Ms. Guthrie's surgery in October. The parties do not request a continuance of the trial currently set to begin April 23, 2024.

Accordingly, the parties propose the following amendments to the current Scheduling Order:

Important Scheduling Dates	
Trial Date	April 23, 2024, at 9:00 a.m. EST
Estimated Length of Trial	3 to 4 days
Final Pretrial Conference	April 9, 2024, at 1:30 p.m. EST
Non-dispositive Motions Due	February 23, 2024
Dispositive Motions Due and Daubert Challenge Deadline	January 31, 2023
Fact and Expert Discovery Cut-Off	January 17, 2023
Expert Disclosure Deadline:	Plaintiff: November 1, 2023 Defendants: December 15, 2023 Rebuttal: December 31, 2023

RESPECTFULLY SUBMITTED this 26th day of September, 2023.

/s/ Cameron C. Kuhlman
CAMERON C. KUHLMAN
Georgia Bar Number: 596159
Attorney for Plaintiff

WETTERMARK & KEITH, LLC
1232 Premier Drive, Suite 325
Chattanooga, TN 37421
Phone: (423) 933-1080
Fax: (205) 460-2596
ckuhlman@wkfirm.com

FRANCIS M. HAMILTON III
United States Attorney

By: */s/ J. Spencer Fair*
J. Spencer Fair (BPR #028069)
Assistant United States Attorney
Attorney for Defendant

800 Market Street, Suite 211
Knoxville, Tennessee 37902
Phone: (865) 545-4167
Spencer.Fair@usdoj.gov